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Attorneys for Petitioner

*United States District Court
Northern District of California
San Francisco Courthouse*

VINCENT TURNER,

Petitioner,

v.

FRED FOULK, Warden, High Desert State
Prison

Respondent,

PEOPLE OF THE STATE OF CALIFORNIA,

Real Party in Interest.

No. 3:13-CV-05718-VC

MOTION AND DECLARATION OF GOOD
CAUSE FOR EXTENSION OF TIME TO
FILE TRAVERSE AND REPLY
MEMORANDUM

**MOTION AND DECLARATION OF GOOD CAUSE FOR
EXTENSION OF TIME TO FILE TRAVERSE AND REPLY MEMORANDUM**

I, Paul McCarthy, declare under penalty of perjury as follows:

1. I am the attorney for petitioner in this case.
2. Respondent's Answer was filed on June 5, 2014. Utilizing the deadline set forth in the Order to Show Cause, the Traverse is due on July 5, 2014.
3. Counsel requests an extension of 30 days, so that the traverse and reply will be due on Monday, August 4, 2014.
4. Petitioner has not previously requested any extensions of time to file the traverse and

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1 reply memorandum.

2 5. Within the last 30 days, I prepared and filed two federal petitions for writ of habeas
3 corpus (Moran and Gonzalez). I also filed a traverse for Fernandez and an opening brief in the
4 First Appellate District (Jimenez). Because of the work on these items, I will be unable to
5 prepare and file the traverse and reply memorandum by the due date.

6 6. On June 27, 2014, my office contacted Margo Yu, the listed attorney of record for
7 respondent. Ms. Yu indicated that she had no objection to the request.

8 I declare under penalty of perjury that the facts stated in this declaration are true and
9 correct. Executed in Oakland, California, on Friday, June 27, 2014.

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13 Paul McCarthy
Attorney for Petitioner

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16 Date: July 3, 2014

